

**CONTINUATION OF APPLICATION FOR A CRIMINAL COMPLAINT  
AND ARREST WARRANT**

I, Cameron Bunker, being duly sworn, depose and state as follows:

**INTRODUCTION, AGENT BACKGROUND, AND PURPOSE OF THE WARRANT**

1. The facts of this case, as more fully detailed below, reveal that Octavio Manuel COBOS-Garcia, a native and citizen of Mexico, was previously removed from the United States, subsequent to a conviction for commission of an aggravated felony, and later reentered the United States without permission at an unknown date and unknown location.

2. I am familiar with the information contained in this continuation based upon the investigation I have conducted and based on information provided to me by other law enforcement officers.

3. The facts in this continuation come from my personal observations, my training and experience, and information obtained from other agents and witnesses. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

4. I am a Special Agent (SA) with Homeland Security Investigations (HSI) out of the Grand Rapids, Michigan office and have been with HSI since May 2023. As part of my duties as a Special Agent with HSI, I am authorized to investigate violations of laws of the United States, including violations pertaining reentry of removed aliens, in violation of 8 U.S.C. § 1326, Reentry of Removed Aliens. I graduated from the Federal Law Enforcement Training Center's (FLETC) Criminal Investigators Training Program,

where I also completed the Homeland Security Investigations Special Agent Training program where I was trained in immigration law. Prior to my tenure as a Special Agent, I was a Uniformed Division Officer with the United States Secret Service for four years. As a Uniformed Division Officer, I enforced both federal and Washington, D.C. laws while working a perimeter around the White House complex. I obtained a bachelor's degree in Criminal Justice - Law Enforcement and associate's degrees in both Criminal Justice - Homeland Security and Computer Networking from Lake Superior State University.

5. This continuation contains information necessary to support a finding of probable cause to charge Octavio Manuel COBOS-Garcia for a violation of 8 U.S.C. 1326(a) & (b)(2), which makes it a crime for any alien that has been denied admission, excluded, deported, or removed or has departed the United States while an order of exclusion, deportation, or removal, is outstanding, and thereafter enters, or is at any time found in, the United States. COBOS-Garcia is subject to enhanced sentencing because his removal was subsequent to conviction of an aggravated felony offense. 8 U.S.C. § 1326(b)(2). Aggravated felony offense is defined to include a drug trafficking crime. 8 U.S.C. § 1101(a)(43)(B).

#### **FACTS ESTABLISHING PROBABLE CAUSE**

6. On December 15, 1994, COBOS-Garcia was removed from the United States via the Laredo, TX Port of Entry. He was removed after his convictions in 1994 for delivery/manufacture of a Schedule 4 controlled substance and conspiracy to

deliver/manufacture a Schedule 4 controlled substance in the 24th Circuit Court in Sanilac County, Michigan. These are felony offenses punishable by a maximum of four years in prison. *See* Mich. Comp. Laws § 333.7401(2)(c). COBOS-Garcia was sentenced to 180 days for those offenses.

7. On May 3, 2010, COBOS was arrested for a violation of 8 U.S.C. § 1326. COBOS was convicted and after COBOS served his sentence, COBOS was deported from the United States via the Chicago Port of Entry on February 1, 2013.

8. On January 30, 2025, Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) Grand Rapids and Enforcement and Removal Operations (ERO) Grand Rapids were conducting surveillance near 3563 Grindstone Ct SE, Caledonia, MI 49316, the verified address of COBOS's wife, Michelle Lynn Treece. At or around 0730 hours, ERO Grand Rapids observed an older Hispanic male enter and depart in a silver Nissan Frontier bearing MI license plate EXF3417, depart a parking area in front of the COBOS's residence. HSI conducted a database query of the Nissan in the Law Enforcement Information Network, and observed the Nissan Frontier was registered to COBOS's wife at their residence. ERO Grand Rapids conducted surveillance of the Nissan Frontier, and followed it to Mediterranean Island International Foods, 4301 Kalamazoo Ave SE, Grand Rapids, MI 49508. ERO Grand Rapids observed an individual matching COBOS's description park and exit the Nissan and enter Mediterranean Island Foods.

9. HSI and ERO Grand Rapids conducted foot surveillance in the area of Mediterranean Island Foods, and again observed the same individual matching

COBOS's description. ERO Grand Rapids identified themselves to COBOS and asked for his name and identification. COBOS handed ERO Grand Rapids an expired Michigan Operator's License bearing the name OCTAVIO MANUEL COBOS with the date of birth of 05/21/1973. COBOS was arrested by HSI and ERO Grand Rapids for violation of 8 U.S.C. § 1326(a) and (b)(2), Aggravated Felon Reentry.

10. ERO Grand Rapids conducted subsequent record checks of the subject's fingerprints through IAFIS, NCIC and other systems checks identified him as Octavio Manuel COBOS-Garcia, Date of Birth 05/21/1973, FBI# 611177VA0, A# 073021996.

11. Based on my training and experience as a Special Agent for ICE HSI, and the information contained in this continuation, I believe that probable cause exists to believe that Octavio Manuel COBOS-Garcia did reenter the United States after removal subsequent to a conviction for commission of an aggravated felony without the permission of the Attorney General or Secretary of Homeland Security, in violation of 8 U.S.C. 1326(a) & (b)(2).